

U.S. Department of Justice

Washington, DC 20530

**Exhibit A to Registration Statement****Pursuant to the Foreign Agents Registration Act of 1938, as amended**

**INSTRUCTIONS.** Furnish this exhibit for EACH foreign principal listed in an initial statement and for EACH additional foreign principal acquired subsequently. The filing of this document requires the payment of a filing fee as set forth in Rule (d)(1), 28 C.F.R. § 5.5(d)(1). Compliance is accomplished by filing an electronic Exhibit A form at <https://www.fara.gov>.

**Privacy Act Statement.** The filing of this document is required by the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide this information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <https://www.fara.gov>.

**Public Reporting Burden.** Public reporting burden for this collection of information is estimated to average .49 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

**1. Name and Address of Registrant**

Zeppelin Communications, 411 Main Street, East Aurora NY 14052

**2. Registration No.**

6709

**3. Name of Foreign Principal**

Kateryna Odarchenko

**4. Principal Address of Foreign Principal**

Mykhaila Lomonosova St, 21, Kyiv, Ukraine, 02000

**5. Indicate whether your foreign principal is one of the following:**

- Government of a foreign country<sup>1</sup>
- Foreign political party
- Foreign or domestic organization: If either, check one of the following:
- |   |   |
|---|---|
| <input type="checkbox"/> Partnership            | <input type="checkbox"/> Committee                      |
| <input type="checkbox"/> Corporation            | <input type="checkbox"/> Voluntary group                |
| <input checked="" type="checkbox"/> Association | <input type="checkbox"/> Other ( <i>specify</i> ) _____ |
- Individual-State nationality \_\_\_\_\_

**6. If the foreign principal is a foreign government, state:**

a) Branch or agency represented by the registrant

b) Name and title of official with whom registrant deals

**7. If the foreign principal is a foreign political party, state:**

a) Principal address

b) Name and title of official with whom registrant deals

c) Principal aim

<sup>1</sup> "Government of a foreign country," as defined in Section 1(e) of the Act, includes any person or group of persons exercising sovereign de facto or de jure political jurisdiction over any country, other than the United States, or over any part of such country, and includes any subdivision of any such group and any group or agency to which such sovereign de facto or de jure authority or functions are directly or indirectly delegated. Such term shall include any faction or body of insurgents within a country assuming to exercise governmental authority whether such faction or body of insurgents has or has not been recognized by the United States.

8. If the foreign principal is not a foreign government or a foreign political party:

a) State the nature of the business or activity of this foreign principal.

The Republic of Ukraine's Institute for Democracy and Development (PolitA) is a non-government organization established by Ukrainian community leaders and experts in political science, strategic planning and analysis to promote democratic development in Ukraine and its civil society.

b) Is this foreign principal:

- Supervised by a foreign government, foreign political party, or other foreign principal Yes  No
- Owned by a foreign government, foreign political party, or other foreign principal Yes  No
- Directed by a foreign government, foreign political party, or other foreign principal Yes  No
- Controlled by a foreign government, foreign political party, or other foreign principal Yes  No
- Financed by a foreign government, foreign political party, or other foreign principal Yes  No
- Subsidized in part by a foreign government, foreign political party, or other foreign principal Yes  No

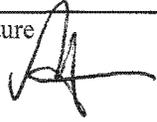
9. Explain fully all items answered "Yes" in Item 8(b). *(If additional space is needed, a full insert page must be used.)*

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

The Institue for Demcoracy and Development (PolitA) is a registered public organization, not owned by any person, government entity or private company.

**EXECUTION**

In accordance with 28 U.S.C. § 1746, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this Exhibit A to the registration statement and that he/she is familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date of Exhibit A 1/5/20 2020	Name and Title Michael R. Caputo, Managing Director	Signature 
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U.S. Department of Justice

Washington, DC 20530

**Exhibit B to Registration Statement****Pursuant to the Foreign Agents Registration Act of 1938, as amended**

**INSTRUCTIONS.** A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements, or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. Compliance is accomplished by filing an electronic Exhibit B form at <https://www.fara.gov>.

**Privacy Act Statement.** The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <https://www.fara.gov>.

**Public Reporting Burden.** Public reporting burden for this collection of information is estimated to average .33 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant Michael R. Caputo	2. Registration No. 6709
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3. Name of Foreign Principal

Kateryna Odarchenko

Check Appropriate Box:

4.  The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach a copy of the contract to this exhibit.
5.  There is no formal written contract between the registrant and the foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach a copy of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
6.  The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and expenses, if any, to be received.
7. Describe fully the nature and method of performance of the above indicated agreement or understanding.

To help organize the March 2-5, 2020 working visit of a delegation of 10-15 Ukrainian political campaign professionals in Washington DC by arranging meetings with US Congressmen and Senators, representatives of the Trump Administration, media, and leaders of democratic development non-government organizations where the delegation will discuss Ukraine's civic development and the future of Ukraine-United States relations.

8. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

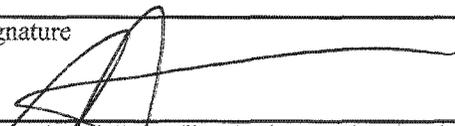
Zeppelin Communications and Michael R. Caputo provide public affairs and event management services for the Institute for Democracy and Development (Polita).

9. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act and in the footnote below? Yes  No

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

**EXECUTION**

In accordance with 28 U.S.C. § 1746, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this Exhibit B to the registration statement and that he/she is familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date of Exhibit B	Name and Title	Signature
15 JAN 2020	Michael R. Caputo, Managing Director	

Footnote: "Political activity," as defined in Section 1(o) of the Act, means any activity which the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

DATE: December 16, 2019

Mr. Michael R. Caputo  
Managing Director  
Zeppelin Communications  
411 Main Street  
East Aurora, NY 14052 USA

Dear Michael:

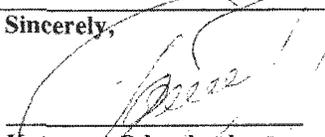
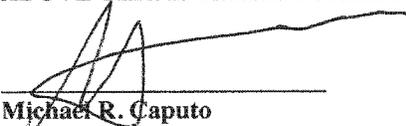
I am writing to outline our agreement to work with us in cooperation to organize the working visit of a delegation of Ukrainian professionals to Washington, DC for dates to be determined in March 2020. The Institute for Democracy and Development "Polita" is a nationwide public organization, established by Ukrainian community leaders and experts in political science, strategic planning and analysis to promote democratic development of Ukraine and its civil society.

The 2020 Polita delegation is keenly interested in discussing our nation's civic development and the future of Ukraine-United States relations. Our main challenge is to arrange meetings with United States Congressmen and Senators, key representatives of the Trump Administration, interested reporters, and leaders of democratic development non-government organizations. Our 10-15 attendees will include:

- Iryna Venediktova – Lawyer, Doctor of Law, Professor, and Member of Parliament of Ukraine associated with the Servant of the People Party.
- Timur Chmeruk – Entrepreneur, partner of the international investment company Base Capital Management investment company, member of the Ukrainian Association of Professionals in the field of public affairs.
- Sergiy Klets - Managing Partner of Questa Group law firm.
- Kateryna Odarchenko – political expert, president of the Polita Institute for Democracy and Development, founder of SIC Group Ukraine, member of the IAPC International Association of Political Consultants.

Polita agrees to pay all reasonable expenses for you and others related to our cooperation, including air travel, hotels, ground transportation, meals, and other trip-related costs. We also agree to pay your firm Zeppelin Communications \$1 United States dollar for your services, which will begin upon the date of your signature below and terminate on April 30, 2020.

Thank you for agreeing to work with us for this time and at this rate to assure our trip is successful and our mission is accomplished.

<p>Sincerely,</p>  <p>Kateryna Odarchenko President Polita</p> <p>17 16</p> <p>Date</p> 	<p>ABOVE TERMS HEREBY AGREED:</p>  <p>Michael R. Caputo Managing Director Zeppelin Communications</p> <p>13 JAN 2020</p> <p>Date</p>
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